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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Jun 02, 2020

SEAN F. McAVOY, CLERK

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JAZZLYNN JOHNSON,
15 BRYON TELLIER, and
16 STEPHEN JOHNSON

17 Defendants.

2:20-CR-53-WFN

INDICTMENT

Vio: 18 U.S.C. §§ 471, 2
Manufacture Counterfeit
Obligations and Securities of
United States
(Count 1)

18 U.S.C. §§ 472, 2
Uttering Counterfeit
Obligations and Securities of
United States
(Count 2)

Forfeiture Allegations
18 U.S.C. § 982(a)(2)(B),
18 U.S.C. § 492, and
28 U.S.C. § 2461(c)

24 The Grand Jury charges:

25 COUNT 1

26 Beginning on a date unknown, but by on or about March 29, 2020, and
27 continuing until on or about April 7, 2020, in the Eastern District of Washington,
28 the Defendants, JAZZLYNN JOHNSON, BRYON TELLIER, and STEPHEN

1 JOHNSON, with the intent to defraud, did falsely make, forge, and counterfeit
2 \$100 denomination Federal Reserve Notes, bearing serial numbers:
3 EC90304318C, GS19710326Y, GS21739318Y, GS81739878Y, IL71282013Y,
4 GS21739312Y, EC20104346C, IL70182067Y, EC9930444311C, GS77710029Y,
5 IL08882013Y, GS51710011Y, GS51710016Y, and RD38359900M; in violation of
6 18 U.S.C. §§ 471, 2.

7
8 COUNT 2

9 On or about April 7, 2020, in the Eastern District of Washington, the
10 Defendants, JAZZLYNN JOHNSON and BRYON TELLIER, with the intent to
11 defraud, did pass and utter to an employee of Rite-Aid, 12222 E. Sprague, Spokane
12 Valley, Washington, a falsely made, forged and counterfeited \$100 Federal
13 Reserve Note bearing serial number: IL0328205Y, which each of the Defendants
14 then knew to be falsely made, forged and counterfeited, in violation of 18 U.S.C.
15 §§ 472, 2.

16 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

17 The allegations contained in this Indictment are hereby re-alleged and
18 incorporated by reference for the purpose of alleging forfeitures.

19 Pursuant to 18 U.S.C. § 982(a)(2)(B), upon conviction of an offense in
20 violation of 18 U.S.C. §§ 471, 472, and 2, as set forth in Count 1 and Count 2 of
21 the Indictment, the Defendants, JAZZLYNN JOHNSON, BRYON TELLIER, and
22 STEPHEN JOHNSON, shall forfeit to the United States of America any property
23 constituting, or derived from, any proceeds obtained, directly or indirectly, as the
24 result of such violation.

25 If any of the property described above, as a result of any act or omission of
26 the Defendants:

- 27
28 a. cannot be located upon the exercise of due diligence;
b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

Pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c) upon conviction of an offense in violation of 18 U.S.C. §§ 471, 472, and 2, as set forth in Count 1 and Count 2 of the Indictment, the Defendants, JAZZLYNN JOHNSON, BRYON TELLIER, and STEPHEN JOHNSON, shall forfeit to the United States of America all counterfeits of any coins or obligations or other securities of the United States or of any foreign government; any articles, devices, and other things made, possessed, or used in violation of 18 U.S.C. §§ 471, 472; and, any material or apparatus used or fitted, or intended to be used, in the making of such counterfeits, articles, devices, or things, found in the possession of the Defendants without proper authority. The property to be forfeited, includes but is not limited to, the following listed assets:

- a. HP Office Jet 4650 Printer, S/N TH75KD2G9, no power cable;
- b. Black ZTE cellphone with smashed screen, no power cable;
- c. Blue BNY 16 GB Thumbdrive;
- d. Black Cruzer 8 GB Thumbdrive;
- e. Black HP Office Jet 200 Mobile Printer, S/N HQ-TRE 71025;
- f. Black metal credit card punch machine with red handle; and,
- g. Silver Central Machinery Ultrasonic Cleaner machine, serial number 374051847.

If any of the property described above, as a result of any act or omission of the Defendants:

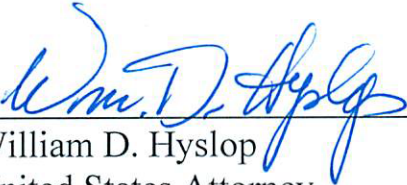
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c). All pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c).

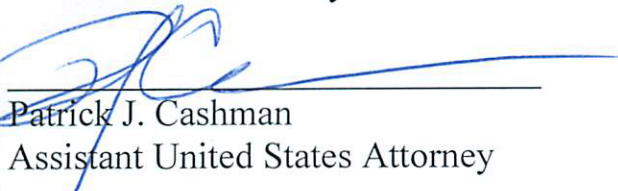
DATED this 2 day of June, 2020.

A TRUE BILL

Foreperson



William D. Hyslop
United States Attorney



Patrick J. Cashman
Assistant United States Attorney